



15PP

DEFENSE LOGISTICS AGENCY
HEADQUARTERS

8725 JOHN J. KINGMAN ROAD, SUITE 2533
FORT BELVOIR, VIRGINIA 22060-6221

IN REPLY
REFER TO

DSS-E

OPPT-2002-0013-0010

JAN. 19 2001

Honorable Carol Browner
Administrator, Environmental Protection Agency
ATTN: OPPT Document Control Officer (7407)
401 M Street, SW
Washington, DC 20460

Dear Ms. Browner:

The Defense Logistics Agency (DLA), a component of the Department of Defense (DoD), respectfully submits the enclosed petition for an exemption to import polychlorinated biphenyls (PCBs) and PCB items at concentrations less than 50 parts per million into the United States for purposes of disposal. Granting this exemption will allow the DLA to safely dispose of low level PCB-containing waste while giving the United States the means to take responsibility for waste generated by its military activities overseas.

This petition is submitted in accordance with 40 CFR 750, Subpart B, Interim Procedural Rules for Manufacturing Exemptions, and pursuant to Section 6(e)(3)(B) of the Toxic Substances Control Act. Also enclosed is the endorsement of the Deputy Under Secretary of Defense (Environmental Security), Ms. Sherri W. Goodman.

Our DLA point of contact for this matter is Ms. Karen Moran at (703) 767-6237.

Sincerely,

HENRY T. GLISSON
Lieutenant General, USA
Director

Enclosures

CONTAINS NO CBI

Contain NO CBI





ACQUISITION AND
TECHNOLOGY

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON DC 20301-3000

JAN. 19 2001

Honorable Carol Browner
Administrator, Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Ms. Browner:

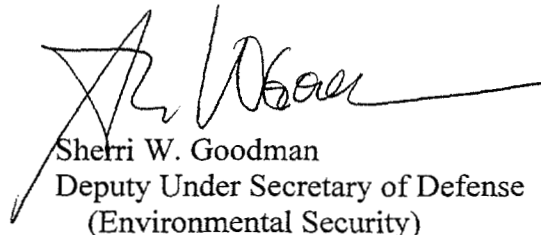
The Department of Defense endorses the Defense Logistics Agency's petition for an exemption to the Toxic Substance Control Act to allow import of certain polychlorinated biphenyls (PCBs) and PCB items into the United States for purposes of disposal.

The U.S. Armed Forces are an indispensable and highly visible instrument of U.S. foreign policy. Through our military presence overseas, the United States exerts an influence on the global community. This influence is manifested in our approach to security arrangements, alliances, and international agreements ranging from non-proliferation of weapons of mass destruction to trade and the environment. However, this presence overseas unavoidably results in generation of wastes, some of it hazardous, and some of it related to PCBs manufactured before their hazards were recognized. Granting this exemption will allow the DLA to safely dispose of low level PCB-containing waste while giving the United States the means to take responsibility for waste generated by its activities overseas.

The importance of this issue was noted in my November 28, 2000 letter providing DoD's comments to a rule EPA recently proposed to address imports of PCBs from U.S. territories (OPPTS-66020). The United States Government has an obligation to dispose of its own wastes properly, regardless of where those wastes were generated and regardless of the origins of the PCBs that become U.S.-generated wastes.

The point of contact in my office is Ms. Maureen Sullivan, (703) 604-0519. The DLA point of contact for this matter is Ms. Karen Moran, (703) 767-6237.

Very truly yours,



Sherri W. Goodman
Deputy Under Secretary of Defense
(Environmental Security)

2

Environmental Security



Defending Our Future

PETITION TO THE
ADMINISTRATOR, UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
FOR EXEMPTION UNDER THE
TOXIC SUBSTANCES CONTROL ACT
TO IMPORT AND DISPOSE OF PCBs AND PCB ITEMS

(1) Petitioner: Defense Logistics Agency (DLA), a component of the U.S. Department of Defense, DSS-E, 8725 John J. Kingman Road, Fort Belvoir, VA 22060.¹ Contact: Mr. Jan Reitman, Director, Environmental Policy, 703-767-6243; Ms. Karen Moran, Environmental Quality Staff, 703-767-6237

(2) Exemption requested: An exemption is sought under 15 U.S.C. 2605(e)(3)(B) to import and dispose of transformers, switches, used oil, circuit breakers and debris (rags, small parts, and packaging materials) containing low levels of polychlorinated biphenyls (PCBs) at Environmental Protection Agency (EPA) licensed facilities in the United States. These PCBs and PCB items are currently in temporary storage on Wake Island. United States forces in Japan generated the material when the PCB articles were taken out of service on U.S. military installations in Japan. We believe the PCBs contained in the articles were originally manufactured outside the United States.

(3) Manufacturing sites requiring exemption: None. Exemption is sought for import and disposal only.

(4) Length of time requested for exemption: One year.

(5) Amount of PCBs and PCB items to be imported for disposal: The inventory at Attachment 1 identifies approximately 91 metric tons of material proposed for import and disposal. Based on assumptions regarding weight and volume, the DLA estimates approximately 31 metric tons of this material is liquid containing PCBs.² The laboratory analyses of materials in this shipment indicate PCB concentrations of less than 50 ppm for all material that could be tested without disassembly (see discussion below).

(6) Risk of injury to health or environment:

a. Packing, Import and Transportation. The material is currently "overpacked" in primary and secondary containers in a U.S. Government-owned storage facility. The DLA will import the items on a U.S. flag vessel in accordance with applicable law. Following arrival in the United States, the property will be loaded for shipment on

Department of Transportation (DoT) permitted carriers and transported for initial processing to the Trans-Cycle Industries (TCI) facility, EPA # ALD983167891, located at Pell City, Alabama.

b. Treatment and Disposal. The initial processing of the material will be at TCI in Pell City, Alabama, and will result in three separate waste streams to be treated and disposed of as follows:

1. The metallic components (e.g., transformer carcasses, switches, drip pans, etc.) extracted during initial processing will be cleaned/recycled at TCI's facility in Pell City. The TCI facility will follow its established and approved procedure based on its EPA permit for cleaning components, including testing. Once cleaned, the metallic components will be non-regulated and sent to smelters.

2. The used oil and oils extracted during initial processing will be sent to SUNOHIO, Inc. located in Canton, Ohio, EPA # OHD981100969. All oils will be detoxified and/or de-chlorinated to less than 2 ppm.

3. The non-recyclable residual solid wastes (e.g., wood, paper, ceramics) extracted during initial processing will be sent to Chemical Waste Management, Inc., at Emelle, Alabama, EPA # ALD000622464. All solid wastes will be landfilled.

c. Evaluating Risk of Injury to Health and the Environment.

1. Low PCB Concentrations. All of the material in this shipment that could be sampled and tested without disassembly has been determined through analysis to contain low concentrations of PCBs, i.e., less than 50 ppm. The EPA has previously recognized that such low concentration levels pose significantly limited risk to health and the environment.³ Accordingly, EPA regulation of material with PCB concentrations below 50 ppm is significantly less stringent than for higher concentrations.⁴ While the DLA believes any components that could not be tested were excluded from this shipment, there is a small possibility that internal components of certain transformers may contain PCB constituents. If present, these internal components have not been individually tested, because they are difficult or impossible to test without destroying their structural integrity. In addition, TCI will test all items in this shipment during initial processing. If any items are found to contain PCBs of 50 or more ppm, they will be treated and disposed of in accordance with applicable regulations.

2. Transportation, Handling, Treatment and Disposal in Compliance with U.S. Laws and Regulations. The DLA will import the material on a U.S. flag vessel in compliance with applicable law. Following arrival in the United States, the property will be transported,

handled, treated, and disposed of in conformance with applicable DoT and EPA regulations, permits, and licenses. The items in this shipment are currently packaged in a protective manner to safely withstand the rigors of international, multi-modal transport. This includes appropriate blocking, bracing, overpacking, inclusion of spill containment devices, etc., inside the shipping containers, as required by applicable transportation regulations. EPA licensing of the proposed disposal facilities and approval of the proposed treatment methods assure that exempted import and disposal of the material will present no unreasonable risk of injury to health or the environment. The DLA and its contractors have extensive experience in safely returning other PCB items to the United States for disposal. Over the last four years, the DLA has returned over 1.3 million pounds of U.S.-manufactured PCB items from Japan in the same manner described above with no known spills or safety problems.

3. Continued Storage on Wake Island Presents Unreasonable Risks. Continued storage of the material on Wake Island presents a risk of injury to health and the environment. Wake Island is part of Wake Atoll, which is situated in the northern Pacific Ocean, about two-thirds of the distance from Hawaii to the Northern Mariana Islands. Wake Atoll is a territorial possession of the United States under the responsibility of the U.S. Air Force, delegated from the Department of Interior. The three islands of the atoll (Wake, Peale, and Wilkes) total less than 3 square miles in area. There is no indigenous population on Wake Island itself. Rather, it is occupied and used by elements of the DoD.⁵ Thus, the risk posed by storage of the PCBs is to DoD military personnel, civilian employees, and contractors employed by the U.S. Government. Although the DoD monitors the location and security of the material as well as the weather, this tropical island is occasionally battered by typhoons and its marine environment and climate present risks of container deterioration and potential releases. Storm damage is a particular concern because the island is at or near sea level. Leakage of PCB-contaminated liquids as a result of such damage could create a risk to the limited fresh water supply on the island, located only 13 feet below ground level. Wake Atoll has no EPA permitted disposal facilities for this material. Thus, continued storage at Wake Island is inappropriate for the reasons noted by the EPA in its 1996 PCB Import for Disposal Final Rule:

EPA believes that PCB wastes which are not disposed of for extended periods of time or which are not disposed of in facilities providing equivalent protection from release to the environment may pose an unreasonable risk of injury to health and the environment.⁶

d. Balancing Risks and Interests. The benefit of prompt disposal of the material in the United States, which eliminates the risks inherent in continued storage, far outweighs any risk associated with the DLA's proposed course of action. Granting this petition presents no no unreasonable risks and will serve to mitigate or lessen the risk of injury to the health and environment of the United States, as it will significantly reduce the risk of injury to the

health of persons and the environment in a territorial possession of the United States.⁷ As the EPA has recently noted in promulgating a proposed rule interpreting the Act:

The prohibitions and restrictions on PCBs under TSCA section 6(e) and its implementing regulations protect not only the United States citizens in the 50 states, but United States citizens in all the territories and possessions of the United States. PCBs in the 50 States and in the territories and possessions must be managed and disposed of in a manner that does not present an unreasonable risk to health or the environment.⁸

The EPA, in its 1996 PCB Import for Disposal Final Rule, also underscored the benefit of prompt disposal in the United States:

Based on the persistence of PCBs in the global environment and EPA's finding that any exposure to human beings or the environment may be significant, EPA believes that the safe disposal of PCBs in approved U.S. facilities poses less risk of injury to health or the environment in the United States than the continued presence of PCBs in other countries, since proper disposal in this country provides protection against possible hazards from improper disposal elsewhere.⁹

Granting this petition will eliminate the risks cited above by removing these PCBs from federal property that cannot provide suitable disposal and permitting proper disposal in a manner limiting releases to the environment to the levels permitted by U.S. regulations. Accordingly, this application meets the statutory standard that "no unreasonable risk" may result from the grant of an exemption under the 6(e) authority.

(7) Substitute for Disposal in the United States: In light of the circumstances surrounding importation of this material, the TSCA 6(e)(3)(B) requirement for a finding of good faith efforts to develop chemical substitutes for PCBs should be construed as requiring a showing that good faith effort has been made to find alternatives to disposal in the United States.¹⁰ The DLA submits that despite its good faith efforts to find alternatives to disposal of the material in the United States, there is no reasonable alternative to domestic disposal of these materials.

a. Feasibility of Disposal on Wake Island. Although the low level of PCBs in these materials (based on current test results) would allow them to be disposed of legally and safely in a solid waste landfill, that approach is not appropriate for Wake Island because of its small land area and the fact that all of the island is so close to sea level. Moreover, there are no facilities on Wake Island to provide on-site processing or treatment for disposal off-island. The DLA examined the alternative of transporting and constructing such processing or treatment facilities on Wake Island. To be properly processed, these PCB

materials should be separated into three streams: 1) metallic components to be recycled; 2) used oils to be treated; and 3) non-recyclable material to be disposed of as residual solid wastes. According to TCI, the cost of shipping a mobile PCB treatment system from the United States to Hawaii and back, and operating the system on Wake Island to clean and initially process the shipment, would be \$1.2 million. Additional and potentially significant costs under this scenario include shipping the system from Hawaii to Wake Island and back; providing food and shelter for contractor personnel; providing power and water to operate the mobile system; and completing additional required environmental documentation and other management/oversight activities.

This processing would also leave large quantities of metallic components and non-recyclable materials to be disposed of off-island. In addition, on-island processing would be an incomplete solution that would not obviate the need for this petition, because this process would leave the Government with thousands of pounds of residual PCB-containing materials still requiring a 6(e) petition to be shipped into the United States for disposal. These requirements, including the cost of shipping these materials to proper disposal facilities, would also significantly increase the Government's overall on-site disposal costs.

Processing on-site at a newly established facility will make it more difficult to mitigate the unavoidable risks involved in such activities. Serious PCB spills, worker accidents, and other incidents will likely be more difficult to address in such a remote location. Additional risks may be involved in the creation of the facility on Wake Island, including equipment transportation and construction activities. In light of the concerns cited above, engaging in such processing activities on Wake Island would present significantly greater risks than shipping the materials to a site where the infrastructure and facilities already exist to process them properly.

b. Feasibility of third country disposal. The lack of suitable alternatives for disposal of PCBs generated by U.S. defense activities overseas is an ongoing concern and was explored in detail in a recent report to the U.S. Congress.¹¹ There are no permitted PCB disposal facilities in Japan, where the waste was generated, and the DLA's efforts to dispose of the waste in Canada were unsuccessful.¹² While attempting to effect proper disposal in Canada, the DLA also explored options in other countries. However, because the United States is one of the few nations that has not completed the ratification process to become a Party under the Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and Their Disposal (the Basel Convention), which covers international transport of such materials as PCB wastes among party countries, the DLA is limited to searching for disposal facilities in those Basel Party countries with whom the United States has arrangements under Article 11 of the Convention.

The DLA and its primary disposal contractor made extensive contacts over a period of several months with disposal facilities in numerous locations outside the United States in an effort to identify firms who could dispose of this shipment. The DoD also consulted at length with State Department officials whose responsibilities included international environmental matters and the nations under consideration. The variety of problems identified in these contacts regarding overseas disposal of this shipment resulted in a consensus that use of existing facilities in other developed countries was not a reasonable alternative. The final, coordinated Government position is that this option should be eliminated from further consideration. Aside from these countries, there are no other nations with suitable facilities that could accept the material, given the constraints of Article 11 of the Basel Convention. Even if other countries could accept these wastes, activist groups could be expected to oppose United States disposal of its waste in third countries, because the United States has the technical capability to properly dispose of the hazardous materials itself.

The DLA's diligent but unsuccessful attempts to locate appropriate disposal sites outside the United States demonstrate its good faith efforts to pursue alternatives to disposal within the United States and fulfill the requirements of TSCA 6(e)(3)(B).

(8) Economic consequences if petition is denied: The broad economic consequences of denying this petition are not readily susceptible to objective quantification. For example, there is no reliable way to assess the potential economic consequences to the United States stemming from potential international criticism relating to a decision by the United States not to import for domestic disposal PCB waste the United States itself generated through its military service activities overseas. Regardless of manufacturing origin, the failure of the United States to permit disposal of waste it generated overseas in furtherance of its national interests may strain international relations. During the DLA's efforts to find alternative disposal sites for this material outside the United States, non-governmental organizations and foreign government representatives also objected frequently on these grounds. Similarly, it is difficult to estimate the economic consequences of continued storage of the material on Wake Island and the attendant exposure risks to United States personnel and the local environment, a risk that increases with time. These potential indirect consequences, while difficult to quantify, are of potentially greater magnitude than the direct costs already incurred¹³ or to be incurred for continued storage on Wake Island. The estimated annual cost of maintaining the material on Wake Island is \$40,000, including continuing inspection, labor, and container replacement, but excluding the possible cost of site remediation.

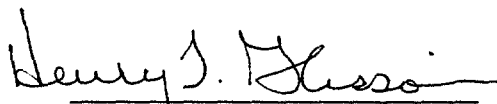
As previously discussed, disposal in third countries is not feasible. If such disposal were feasible, the estimated transport and disposal costs are as follows:

Developed country #1	approx. \$1.15 – 2.25 million
Developed country #2	approx. \$3 million
United States	approx. \$0.85 million

(9) Conclusion: The U.S. Armed Forces are an indispensable and highly visible instrument of U.S. foreign policy. Through our military presence overseas, the United States exerts influence on the global community. This influence is manifested in our approach to security arrangements, alliances, and international agreements ranging from non-proliferation of weapons of mass destruction to trade and the environment. However, this presence overseas unavoidably results in generation of wastes, some of it hazardous, and some of it related to PCBs manufactured before their hazards were recognized.

The exemption requested meets the statutory requirements for relief under section 6(e)(3) of the TSCA. The treatment and disposal facilities are compliant with U.S. law and the proposed import would not result in an "unreasonable risk of injury" to health or the environment. Granting this petition to permit U.S. disposal of these U.S. generated, foreign-manufactured PCBs and PCB items would eliminate the risks inherent in continued storage of this material on Wake Island in a manner that avoids exposing the United States to international criticism for not accepting its own PCB waste. Additionally, the DLA has made every reasonable effort to locate appropriate disposal sites outside the U.S. as a substitute to making this request.

For all the foregoing reasons, the DLA respectfully requests that the Administrator grant the proposed exemption.



HENRY T. GLISSON
Lieutenant General, USA
Director, Defense Logistics Agency

¹ The Defense Logistics Agency is the DoD Component that provides supplies and services to America's military forces at more than 500 sites in all 50 states and more than 25 foreign countries. The DLA manages more than four million consumable items and processes more than 30 million distribution actions annually. When the military no longer needs an item, the DLA arranges for its reutilization or ultimate disposition through the Defense Reutilization and Marketing Service (DRMS), a DLA primary level field activity.

² Based on a review of available documents by DRMS personnel, the approximate weights of various items are provided:

Drummed Oil – 62,895 lbs.
Undrained Items (switches, transformers, etc.) – 59,861 lbs., containing approximately 1705 gallons of liquid.
Drained Items – 38,456 lbs.
Debris – 497 lbs.

Debris – 497 lbs.

³ The EPA's "PCB Q & A Manual" (1994) explains that the processing, distribution in commerce and use of excluded PCB products is generally unregulated, "based upon the Agency's determination that the use, processing, and distribution in commerce of these products with less than 50 ppm PCB contamination will not generally present an unreasonable risk to health or the environment."

⁴ The EPA's TSCA implementing regulations at 40 CFR 761.3 define the category of "PCB excluded" products as materials that have PCB concentrations less than 50 ppm. Such products are excluded from the requirement in 40 CFR 761.20 for totally enclosed use. Included in this category are PCB articles, PCB containers, and transformers with PCB concentrations less than 50 ppm, which are defined as "non-PCB transformers," as well as electrical equipment, including circuit breakers, that contain PCBs at concentrations of less than 50 ppm. Because the transformers and circuit breakers in question contain PCB concentrations less than 50 ppm they would fall within the definition of "excluded PCB products." Additionally, the EPA defines "PCB contaminated" as "containing concentrations greater than or equal to 50 ppm." Therefore, the materials DLA seeks to import should not be classified as "PCB contaminated". See 40 CFR Part 761.3.

⁵ Wake Atoll is a territorial possession of the United States. Pursuant to Executive Order No. 11048, part I (Sept. 5, 1962), the Secretary of the Interior is responsible for the atoll's administration. The Secretary has re-delegated that authority to the General Counsel of the Air Force. As the Ballistic Missile Defense Organization's (BMDO) executive agent for support, the U.S. Army Space and Strategic Defense Command conducts operations on Wake Atoll; the BMDO has largely funded operations on Wake Atoll since 1994.

⁶ 61 Fed. Reg. 11099.

⁷ TSCA was enacted to protect all of the citizens of the United States from unreasonable risk of injury to health or the environment from exposure to chemical substances. Under sections 3(13) and 3(14) of the Act, the "United States" is defined to include "any state of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, the Canal Zone, American Samoa, the Northern Mariana Islands, *or any other territory or possession of the United States.*" (emphasis added)

⁸ Polychlorinated Biphenyls (PCBs): Return of Waste from U.S. Territories Outside the Customs Territory of the United States, 65 Fed. Reg. 65654, (proposed Nov. 1, 2000), at 65656.

⁹ 61 Fed. Reg. 11099.

¹⁰ As a preliminary matter, it should be noted that many of the items in this shipment, which originated from a DLA storage facility in Sagami, Japan, were acquired by the military services prior to the 1979 ban on manufacture or import of PCBs. Thus the military services could not be expected to have expended "good faith" efforts to acquire PCB substitutes at the time the articles were originally obtained. Instead, the DLA's efforts have focused on obtaining suitable disposal for these items.

¹¹ The National Defense Authorization Act for Fiscal Year 1999, section 324, directed the Secretary of Defense to submit a report to the Congress regarding foreign-manufactured PCB waste under DoD control overseas. The report was prepared and submitted in 1999. The EPA concurred in its release, noting that it looked forward to working with the DoD to ensure all PCB wastes are handled in an environmentally sound manner. The report stated in pertinent part:

Shrinking access to adequate disposal facilities overseas is an impediment to the environmentally sound disposal of foreign-manufactured PCB wastes. Most of the facilities that can dispose of PCBs in accordance with DLA standards are located in Europe or North America. Over the past several years, the European Union (EU) member States have been revising their waste policies to

restrict transboundary movements of hazardous waste. Currently, EU law prohibits imports into the EU of waste for disposal, except for parties to the Basel Convention. However, Basel parties wishing to export waste into the EU for final disposal must obtain prior approval from the importing country and must affirmatively show that they do not have and cannot acquire facilities to dispose of the waste in an environmentally sound manner domestically. It is not easy to obtain the cooperation of both the importing and exporting countries and the approval process is very time consuming. (Report to Congress, Foreign Manufactured PCBs at U.S. Military Installations Overseas, p. 15, March 1999).

¹² The DLA's efforts to transport the waste to other countries for disposal have been unsuccessful. The DLA hired a contractor, Trans-Cycle Industries, Inc. (TCI), to dispose of these foreign-made PCBs and PCB items stored in Sagami, Japan. TCI contractually arranged to ship the low-level PCB waste material to a disposal facility in Canada using a commercial shipper as Canada does not regulate PCBs less than 50 ppm. The shipment left Yokohama, Japan on March 23, 2000. Once special interest groups in Canada learned of the shipment, they lobbied Canadian officials to prohibit its planned disposal in Canada. Officials at the Canadian Embassy in Washington, DC, contacted the DoD, the EPA, and the State Department and expressed their desire that the shipment not come to Canada. In addition, Canadian Ministry of Environment officials contacted the U.S. Embassy in Ottawa asking for assistance. The Ministry of Environment also advised the contractor that no facilities in Canada would be able to accept the shipment.

Recognizing that the shipment was very controversial in Canada, with the potential to adversely affect international relations, the DoD, the State Department and the EPA decided it would be prudent to consider other options. On April 5, 2000, the EPA granted conditional approval to TCI to offload the shipment in Seattle, WA for thirty days while the contractor explored other disposal options. However, because of opposition from environmental groups, the Governor of Washington, and Congressional representatives, the PCBs were not offloaded in Seattle as planned. Arrangements were then made for the ship to continue its voyage to Canada to offload other commercial cargo, and the ship departed Vancouver on April 9, 2000, with the low level PCB cargo still on board.

The ship arrived in Yokohama, Japan, on April 18, 2000, but the Japanese government opposed the return of the material. To avoid harm to diplomatic relations between the United States and Japan, while allowing for time to explore other options, the U.S. Ambassador assured the Japanese government that the containers would leave Japan no later than 30 days from April 18, 2000. After lengthy discussions with the State Department, the EPA, the Department of the Interior, and Congressional delegations from Hawaii and Guam, the DoD decided to send the containers to Wake Island, a U.S. unincorporated territory in the Pacific Ocean outside the U.S. customs territory, for temporary storage. The shipment arrived there on May 19, 2000 and the containers were safely offloaded and moved to temporary storage.

¹³ These costs include:

Shipment of 14 PCB containers to Wake Island	\$500,250.00
Preparation of 14 pads to store the containers	\$140,000.00
Discharge Ship	\$ 60,000.00
Environmental Documentation	<u>\$ 30,000.00</u>
Total Direct (Sunk) Costs	\$730,250.00

Key to Wake Island PCB Spreadsheet

Header Information

- Line Item – the item number found on the Department of Defense (DD) Form 1155 (Delivery Order) under contract SP4420-99-D-0009. The original delivery order included items with a PCB concentration >50 ppm. However, the >50 ppm items were not included in this shipment, and their deletion resulted in the numerical gaps on this spreadsheet.
- HIN – Hazardous Item Number, description of item as found in the contract
- Description – Description of the item
- PPM – concentration of PCBs in the item
- Container – how item is packaged
- Weight – self explanatory
- DTID – Disposal Turn In Document number on the Department of Defense Form 1348-1A, Issue/Release/Receipt Document that identifies the generator of the waste.
- Serial Number – manufacturer serial number located on the item
- ND – item tested and analysis indicated less than 2 PPM

Description Information

- PCB CONT LIQUID – PCB contaminated oil
- XFRMR – Undrained transformer
- Dunnage – packaging to include but not limited to crates, pallets and plastic sheeting
- XFRMR DRAINED – Drained transformer
- DEBRIS – small parts, rags and sorbent contaminated with PCBs

Container Information

- 55/85 – 55 gallon drum overpacked in an 85 gallon drum
- DR – Drum
- Crate – wooden crate
- Pallet – self explanatory

Defense Logistics Agency
Wake Island PCBs

Line Item	HIN	Description	PPM	Container	Weight (kg)	DTID	Serial No.	NOTES
0001	E7032	PCB CONT LIQUID	25.8, 37.8, 37.8	3 55/65 DR	660	FB520570155201		
0002	E7032	PCB CONT LIQUID	12.4, 17.7	2 55/65 DR	440	FB520570155202		
0003	E7032	PCB CONT LIQUID	5.41, 25.2, 20.7	3 55/65 DR	863	FB520570155203		
0004	E7051	XFRMR	4, <50	2 EA IN 85 G DR	478	FB520980201001		82086364; 110527
0005	E7051A	XFRMR	37.4; 11.61	2 EA IN 85 G DR	410	FB520980201002		P1315280LP2, VK55671859
0006	E7051A	XFRMR	22.5; ND	2 EA IN 85 G DR	428	FB520980201003		P1315280LP2, VK5525Q677117
0007	E7051A	XFRMR	34.7; ND	2 EA IN 85 G DR	464	FB520980201004		QS, J303803; AN6901002; 86741; 86740
0008	E7051A	XFRMR	ND; 13.9; ND; ND	4 EA IN 85 G DR	732	FB520980201005		G490163; G490164; AN6901003; 86758
0009	E7051A	XFRMR	ND; 8.65; 14.2; 32.79	4 EA IN 55 G DR	582	FB520980201006		G490165; AN6901001; 86742; C31812
0010	E7051A	XFRMR	8.61; 13.5; ND; ND	4 EA IN 55 G DR	727	FB520980201007		
0011	E7040	DUNNAGE (0001-0010)	--		682	FB520980201008		
0012	E7051A	XFRMR	16.6; ND	2 EA IN 85 G DR	428	FB520980201009		G490078; VB65650826
0013	E7051A	XFRMR	16.4; ND	2 EA IN 85 G DR	428	FB520980201010		G490075; 43850001
0014	E7051A	XFRMR	ND	1 PALLET	219	FB520980201011		55800151
0015	E7051A	XFRMR	1.4	1 PALLET	396	FB520980201012		1732150
0016	E7051A	XFRMR	ND	1 PALLET	1226	FB520980201013		11126001
0017	E7051A	XFRMR	49.3	1 PALLET	259	FB520980201014		H20767003
0018	E7051A	XFRMR	2.33	1 PALLET	445	FB520980201015		10940172
0019	E7051A	XFRMR	ND; ND	2 EA IN 85 G DR	555	FB520980201016		5877058; 5877156
0020	E7051A	XFRMR	3.17; 17.29	2 EA IN 85 G DR	500	FB520980201017		6257-1; 6257-2
0021	E7051A	XFRMR	23.21; ND	2 EA IN 85 G DR	600	FB520980201018		6257-3; 21Q807701
0022	E7051A	XFRMR	ND; 9.32	2 EA IN 85 G DR	403	FB520980201019		43850002; 117778
0023	E7051A	XFRMR	12.37; 1.53	2 EA IN 85 G DR	398	FB520980201020		AB55650059; 110530
0024	E7051A	XFRMR	ND; ND	2 PALLETS	587	FB520980201021		AA102503; 21Q807702
0025	E7051A	XFRMR	ND; ND	2 PALLETS	341	FB520980201022		H452793; H452800
0026	E7051A	XFRMR	2.36; 2.51	2 PALLETS	891	FB520980201023		10940158; 10940179
0027	E7051A	XFRMR	ND; 7.4	1 PALLET	648	FB520980201024		160348; 678028
0028	E7051A	XFRMR	41.6	1 PALLET	203	FB520980201025		G710038
0029	E7051A	XFRMR	2.5	1 PALLET	1687	FB520980201026		D813600
0030	E7051A	XFRMR	ND	1 PALLET	2566	FB520980201027		AN1684001
0031	E7051A	XFRMR	18.5	1 PALLET	214	FB520980201028		86426
0032	E7051A	XFRMR	ND	1 PALLET	1214	FB520980201029		AX8636001
0033	E7051A	XFRMR	1	1 PALLET	244	FB520980201030		6899905
0034	E7051A	XFRMR	ND	1 PALLET	405	FB520980201031		610948
0035	E7051A	XFRMR	ND	1 PALLET	284	FB520980201032		H710108
0036	E7051A	XFRMR	8.44	1 PALLET	203	FB520980201033		H20765001
0037	E7051A	XFRMR	ND	1 PALLET	194	FB520980201034		6083-1
0038	E7051A	XFRMR	4.12	1 PALLET	228	FB520980201035		G490160
0039	E7051A	XFRMR	--	1 PALLET	35	FB520980201036		420310SJS
0040	E7051A	XFRMR	12	1 PALLET	371	FB520980201037		908816
0041	E7051A	XFRMR	ND; ND	2 DR	455	FB520980201038		7890-1
0042	E7051A	XFRMR	ND	1 PALLET	2323	FB520980201039		AN0359028; AN0359029; AN0359023
0043	E7051A	XFRMR	19.7	1 PALLET	873	FB520980201040		
0044	E7051A	XFRMR	3.84	1 PALLET	385	FB520980201041		
0045	E7051A	XFRMR	18; 18; 18	2 PALLETS	682	FB520980201042		
0046	E7051A	XFRMR	--	1 PALLET	46	FB520980201043		
0047	E7051A	XFRMR	18	1 PALLET	98	FB520980201044		
0048	E7051A	XFRMR	11.1; 9.1; 26.8	1 CRATE	2980	FB520980201045		259059
0049	E7051A	XFRMR	21; 15	2 CRATE	316	FB520980201046		YB5232010
0050	E7051A	XFRMR	10; 5.91 6	2 DR ON PALLET	1307	FB520980201047		B20038
0051	E7051A	XFRMR	30; 31; 46.2; 44.6	4 EA IN CRATE	999	FB520980201048		8722462; 388784; 7622557; 1695104
0052	E7051A	XFRMR	2; 4.8; 46.4	3 EA IN CRATE	955	FB520980201049		YB5241001; H720039; YB5241003; TB5241002
0053	E7051A	XFRMR	10.8; 37.1; 15; 37.1	4 DR IN CRATE	130	FB520980201050		41410363; C270024; 17550788HS
0054	E7051A	XFRMR	4.8; 25.9; 35.8; 46.8	4 DR IN CRATE	828	FB520980201051		B4984005; 400848LP2; 33050434HS; 5780301
0055	E7051A	XFRMR	5.8; 18	1 CRATE	300	FB520980201052		C270024; 17550788HS; 32050155; G110045
0056	E7051A	XFRMR	--		3644	FB520980201053		1226608; 259059
0057	E7051A	XFRMR	21.7	1 EA IN 85 G DR	12	FB520980201054		
0058	E7051A	XFRMR	ND; 14.2; 14.4; 2.1; 18	1 55/65 G DR	242	FB520980201055		902107802
0059	E7051A	XFRMR	14.4	1 CRATE	1376	FB520980201056		734842; 724891; DR6857001; 2225640; 2635999; 69622358
0060	E7051A	XFRMR			240	FB520980201057		DR6857001

Defense Logistics Agency Wake Island PCBs

0082	E7053A	OIL CIRCUIT BREAKER	ND	1 CRATE	373	N851157158P970	21278
0083	E7053A	OIL CIRCUIT BREAKER	ND	1 CRATE	368	N851157158P971	21154
0084	E7053A	OIL CIRCUIT BREAKER	ND	1 CRATE	368	N851157158P972	21276
0085	E7053A	OIL CIRCUIT BREAKER	ND	1 CRATE	371	N851157158P973	21156
0086	E7053A	OIL CIRCUIT BREAKER	ND	1 CRATE	584	N851157158P974	22597
0087	E7053A	OIL CIRCUIT BREAKER	ND	1 CRATE	382	N851157158P975	21153
0088	E7052A	XFRMR DRAINED	0.2	1 CRATE	293	N85115608T881	5400099
0089	E7052A	XFRMR DRAINED	0.6	1 CRATE	293	N85115608T882	5400099
0090	E7040B	DUNNAGE 0	--	2 EA IN CRATE	177	N851157158P996	K006243; D4342
0091	E7052A	XFRMR DRAINED	44.2; 28.3	2 EA IN CRATE	550	N851156073P974	
0092	E7040B	DUNNAGE 0	--		918	N851157158P976	
0093	E7040B	DUNNAGE 0	--		55	N851156073P981	
0094	E7040B	DUNNAGE 0	--		164	N85115608P973	
0095	E7052A	XFRMR DRAINED	ND	1 EA IN DR	139	N851157265P975	77A410572
0096	E7040B	DUNNAGE 0	--		425	N851156268P971	
0097	E7040B	DUNNAGE 0	--		1323	N825077320484	
0098	E7040B	DUNNAGE 0	--		284	N8250770270478	
0099	E7053A	SWITCH DRAINED	2; 1.7	BOX	1066	N8250773210468	NO LABEL; 51776
0100	E7040B	DUNNAGE 0	--		491	N825077320480	L300347; 006776; 001060; 111031
0101	E7032	PCB CONT LIQUID	22.5; 8.2; 7.4; 3.9	4-55/85 G DR	57	N825077320482	Z188003193
0102	E7032	PCB CONT LIQUID	19.4	1 55/85 G DR	505	N825077320481	G710085; 6748566; 5876644; 6401518KP1
0103	E7032	PCB CONT LIQUID	31.7; 13.9; 15.2; 27.7	4 EA IN 55/85 DR	496	N825077320478	001206; F011501; 001060; F011502
0104	E7032	PCB CONT LIQUID	9.3; 2.7; 7.4; 2.8	4 EA IN 55/85 DR	771	N8250773210460	006776; 001031; 74029; 82896
0105	E7052A	XFRMR DRAINED	8.2; 6.7; ND; 47.2	4 EA IN CRATE	704	N8250773210454	G710085; G710097; Z188003193
0106	E7052A	XFRMR DRAINED	31.7; 11.4; 19.4	3 EA IN CRATE	778	N8250773210467	2TQ086401; 2TQ086402; 2TQ086403
0107	E7052A	XFRMR DRAINED	ND; ND	3 EA IN CRATE	1329	N8250773210466	DF09042331
0108	E7052A	XFRMR DRAINED	ND	1 EA IN CRATE	698	N8250773210465	A842011
0109	E7052A	XFRMR DRAINED	ND	1 EA IN CRATE	1157	N8250773210464	54735
0110	E7052A	XFRMR DRAINED	ND	1 EA IN CRATE	565	N8250773210463	2TQ584301; 2TQ584303
0111	E7052A	XFRMR DRAINED	ND	2 EA IN CRATE	562	N8250773210458	001206; 2TQ584302
0112	E7052A	XFRMR DRAINED	9.3; ND	2 EA IN CRATE	75	N8250780270452	
0113	E7040A	DEBRIS	<50	1 DR	725	N8250773210452	
0114	E7052A	XFRMR DRAINED	25.8; 13.9; 13.3; 4.3	4 EA IN CRATE	769	N8250773210452	88003194; 6748566; C150138; C150148
0115	E7052A	XFRMR DRAINED	11.8; 42; 31; 21	4 EA IN CRATE	524	WTSJOM70970300A	9595-1; YB5237004; YB5241003; YB5239004
0116	E7051A	XFRMR	6; 6; 3	4 EA IN CRATE	769	WTSJOM70970238A	6K5522; 6K5526; 6K5523; S305745
0117	E7032	PCB CONT LIQUID	2; 24.6; 35	4 DR IN CRATE	769	WTSJOM70970298A	6L-3574; H710056; YB5234004
0118	E7032	PCB CONT LIQUID	30; 46.2; 45; 48	4 DR IN CRATE	769	WTSJOM70970297A	H720039; YB5234081; YB5237009; YB5241001
0119	E7032	PCB CONT LIQUID	45; 40; 42; 48	4 DR IN CRATE	769	WTSJOM70970296A	YB5234003; YB5237029; YB5234008; YB5237014
0120	E7032	PCB CONT LIQUID	21; 3	4 DR IN CRATE	769	WTSJOM70970295A	
0121	E7032	PCB CONT LIQUID	3; 15	4 DR IN CRATE	960	WTSJOM70970294A	681010
0122	E7032	PCB CONT LIQUID	5.8; 15; 8.6	4 DR IN CRATE	960	WTSJOM70970293A	681010
0123	E7032	PCB CONT LIQUID	5.8	4 DR IN CRATE	960	WTSJOM70970292A	126608; 126607
0124	E7032	PCB CONT LIQUID	5.8	4 DR IN CRATE	960	WTSJOM70970291A	126608
0125	E7032	PCB CONT LIQUID	8.6; 5.8	4 DR IN CRATE	960	WTSJOM70970290A	126607; 126608
0126	E7032	PCB CONT LIQUID	8.6; 5.8	4 DR IN CRATE	960	WTSJOM70970289A	126607; 126608
0127	E7032	PCB CONT LIQUID	8.6; 5.8	4 DR IN CRATE	960	WTSJOM70970288A	126607
0128	E7032	PCB CONT LIQUID	5.8	4 DR IN CRATE	960	WTSJOM70970287A	126607
0129	E7032	PCB CONT LIQUID	8.6	4 DR IN CRATE	960	WTSJOM70970286A	126607
0130	E7032	PCB CONT LIQUID	8.6	4 DR IN CRATE	960	WTSJOM70970285A	126607
0131	E7032	PCB CONT LIQUID	8.6; 5.8	4 DR IN CRATE	960	WTSJOM70970284A	126607
0132	E7032	PCB CONT LIQUID	19.7; 20	2 DR IN CRATE	348	WTSJOM7160409A	16157558; 1312172KP1
0133	E7032	PCB CONT LIQUID	33; 14	2 EA IN CRATE	241	WTSJOM70760239A	C-29295; S303902
0134	E7051A	XFRMR	--		1077	WTSJOM71190345A	
0135	E7051A	DUNNAGE (0119-0134)	--		120	WTSJOM71190346A	
0136	E7040B	DUNNAGE (0137; 0120)	37.4	1-85 G DRUM	256	M6261360591109A	
0137	E7032	PCB CONT LIQUID	9.1	1-85 G DRUM	218	M6261360591101A	
0138	E7032	PCB CONT LIQUID	6.7	1-85 G DRUM	208	M6261360591112A	
0139	E7051A	XFRMR	8.1	1-85 G DRUM	226	M6261361351101A	
0140	E7051A	XFRMR	0.2	1-85 G DRUM	297	M6261360591111A	
0141	E7032	PCB CONT LIQUID	13; 14; 14	1-85 G DRUM	67	M6261360591105A	
0142	E7032	PCB CONT LIQUID	<50	1-85 G DRUM	85	M6261360591113A	
0143	E7040A	DEBRIS	14.2	1-55 G DRUM	40	N8273571366001A	
0144	E7052A	XFRMR DRAINED	--		941	N8250770570479A	
0145	E7040B	DUNNAGE (0147)	10.3; 1.5; 1.7; 25; 10.3; 27.9; 23.7	4 DR IN CRATE			
0146	E7040B	PCB CONT LIQUID					

**Defense Logistics Agency
Wake Island PCBs**

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15